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ATTORNEYS FOR ALL PLAINTIFFS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO/OAKLAND  
DIVISION

JANE ROE, an individual; MARY ROE,  
an individual; SUSAN ROE, an  
individual; JOHN ROE, an individual;  
BARBARA ROE, an individual;  
PHOENIX HOTEL SF, LLC, a  
California limited liability company;  
FUNKY FUN, LLC, a California limited  
liability company; and 2930 EL  
CAMINO, LLC, a California limited  
liability company,

Plaintiffs,

v.

CITY AND COUNTY OF SAN  
FRANCISCO, a California public entity,

Defendants.

Case No. 4:24-cv-01562-JST

**DECLARATION OF ASHCON  
MINOIEFAR IN SUPPORT OF  
PLAINTIFFS' STATEMENT TO  
CONSIDER WHETHER  
PLAINTIFFS' MATERIAL SHOULD  
BE SEALED**

**ASSIGNED FOR ALL PURPOSES  
TO THE HONORABLE DISTRICT  
JUDGE JON S. TIGAR,  
COURTROOM 6**

Action Filed: 03/14/2024  
Trial Date: Unassigned

1 I, Ashcon Minoiefar, declare as follows:

2       1. I am an attorney duly admitted to practice before this Court. I am an  
 3 associate with Walkup, Melodia, Kelly & Schoenberger, attorneys of record for ALL  
 4 PLAINTIFFS. I have personal knowledge of the facts set forth herein, and if called  
 5 as a witness, I could and would competently testify thereto. I make this declaration  
 6 based in support of Plaintiffs' Statement in Support of Whether Plaintiffs' Deposition  
 7 Transcripts and Related Exhibits Should Be Sealed.

8       2. Below is a table of the portions of Defendants' Opposition to Plaintiffs'  
 9 Motion for Preliminary Injunction sought to remain under seal:

DOCUMENT	PORTION TO BE FILED UNDER SEAL	ORDER
<b>Exhibit 1</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of Jane Roe.	Family member's identifying information on page 27, lines 3 through 5.	
<b>Exhibit 1</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of Jane Roe.	Identifying information relating to the address of Jane Roe on page 106, lines 12 through 20.	
<b>Exhibit 1</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of Jane Roe.	Identifying information relating to the address of Jane Roe on page 117, lines 14 through 16.	
<b>Exhibit 1</b> to the Declaration of Abigail Wald	Identifying information relating to the address of	

1	in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of Jane Roe.	Jane Roe on page 138 lines 1 through 2.	
5	<b>Exhibit 1</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of Jane Roe.	Identifying information relating to the address of Jane Roe on page 143 lines 4 through 12.	
11	<b>Exhibit 2</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of Jane Roe's residence and address.	
16	<b>Exhibit 3</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of the area surrounding Jane Roe's residence and address.	
21	<b>Exhibit 4</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of the area surrounding Jane Roe's residence and address.	
26	<b>Exhibit 5</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for	The entire photograph of Jane Roe's residence and address.	

1	Preliminary Injunction Filed Under Seal.		
2	<b>Exhibit 6</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of the area surrounding Jane Roe's residence and address.	
3	<b>Exhibit 7</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of the area surrounding Jane Roe's residence and address.	
4	<b>Exhibit 8</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of the area surrounding Jane Roe's residence and address.	
5	<b>Exhibit 9</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of the area surrounding Jane Roe's residence and address.	
6	<b>Exhibit 10</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of the area surrounding Jane Roe's residence and address.	
7	<b>Exhibit 11</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San	Identifying information relating to the address of John Roe on page 69 lines 4, 8, 13, 17, and 22.	
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1	Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.		
4	<b>Exhibit 11</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 88 line 19, page 89 lines 1-5, 9, 17 and 21.	
10	<b>Exhibit 11</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 118 lines 2, 6-7, 9, 16, and 24.	
15	<b>Exhibit 11</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 129 line 4.	
21	<b>Exhibit 11</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 130 lines 2 and 24.	
26	<b>Exhibit 11</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to	Identifying information relating to the address of John Roe on page 156 line 15..	

1	Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.		
2	<b>Exhibit 11</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 158 line 1.	
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9	<b>Exhibit 11</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 159 line 8.	
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14	<b>Exhibit 12</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	All four photographs in their entirety of John Roe's residence and address.	
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19	<b>Exhibit 14</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of Barbara Roe.	The identifying information of Barbara Roe on page 32 lines 9 through 10.	
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25	<b>Exhibit 14</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction	The addresses of Barbara Roe on page 32 line25.	
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1	Filed Under Seal, Deposition of Barbara Roe.		
2	<b>Exhibit 15</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of Barbara Roe's residence and address.	
3	<b>Exhibit 16</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of Barbara Roe's residence and address.	
4	<b>Exhibit 17</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of Barbara Roe's residence and address.	
5	<b>Exhibit 18</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of Barbara Roe's residence and address.	
6	<b>Exhibit 19</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of Barbara Roe's residence and address.	
7	<b>Exhibit 22</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San	The address of Mary Roe on page 62 lines 2 through 6.	
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1	Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of Mary Roe.		
4	<b>Exhibit 23</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of Mary Roe's residence and address.	
9	<b>Exhibit 24</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of Mary Roe's residence and address.	
14	<b>Exhibit 25</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of Mary Roe's residence and address.	
19	<b>Exhibit 26</b> to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	The entire photograph of Mary Roe's residence and address.	

24 I declare under penalty of perjury under the laws of the United States of  
 25 America that the foregoing is true and correct to the best of my knowledge.  
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1 Executed on this 29th day of September, 2025, at San Francisco, California.  
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## PROOF OF SERVICE

**Jane Roe, et al. v. City and County of San Francisco, et al.  
USDC-Northern California Case No. 4:24-cv-01562-JST**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the county where the mailing took place, My business address is 650 California Street, 26th Floor, City and County of San Francisco, CA 94108-2615.

On the date set forth below, I caused to be served true copies of the following document(s) described as

**DECLARATION OF ASHCON MINOIEFAR IN SUPPORT OF PLAINTIFFS'  
STATEMENT TO CONSIDER WHETHER PLAINTIFFS' MATERIAL  
SHOULD BE SEALED**

to:

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1

2 **BY ELECTRONIC TRANSMISSION:** Pursuant to CCP 1010.6(e), I caused  
the above-titled document(s) to be electronically served on the persons at the  
3 electronic service addresses listed.

4 I declare under penalty of perjury under the laws of the United States of  
America that the foregoing is true and correct and that I am employed in the office of  
5 a member of the bar of this Court at whose direction the service was made.

6 Executed on September 29, 2025, at San Francisco, California.

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9 Kirsten Benzien  
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